<u>REMARKS</u>

This application has been reviewed in light of the Office Action dated August 11, 2005. Claims 16-29 are presented for examination. Claims 16, 19, 22 and 26 have been amended to define still more clearly what Applicant regards as his invention. Claims 16, 19, 22 and 26 are in independent form. Favorable reconsideration is requested.

Claims 16-29 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement on the ground that the claims contain new matter, and the specification was objected to under 35 U.S.C. § 132(a) on the same ground. Specifically, the Office Action states that the new matter is believed to be the third memory and anything associated with the third memory.

Applicant traverses the rejection under Section 112 and the objection under Section 132. Applicant respectfully submits that the third memory finds clear support in the original specification in the references to FIFO 315 and FIFO 501, and that the claim recitations associated with the third memory find support on at least page 18, line 10 - page 27, line 23 and page 28, line 14 - page 33, line 13. Accordingly, Applicant respectfully requests withdrawal of the rejection under Section 112 and objection under Section 132.

Claims 16-21 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,809,834 (Sato); and Claims 22-29 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Sato in view of U.S. Patent No. 5,625,466 (Nakajima).

As shown above, Applicant has amended independent Claims 16, 19, 22 and 26 in terms that more clearly define what he regards as his invention. Applicant submits that these amended independent claims, together with the remaining claims dependent thereon, are

patentably distinct from the cited prior art for at least the following reasons.

Claim 16 is directed to a printer including a control unit having a first memory for storing image data generated based on print data received from an external apparatus. The printer also includes an engine unit including a second memory for storing the image data received from the control unit and a print engine for printing the image data stored in the second memory. The control unit includes a transfer unit for transferring the image data read from the first memory to the second memory. The transfer unit includes a third memory for storing the image data read from the first memory, and reads rotated image data from the third memory and transfers the rotated image data to the second memory without transferring the rotated image data to the first memory.

Among other important features of Claim 16 is that the control unit includes a transfer unit for transferring the image data read from the first memory to the second memory, and that the transfer unit includes a third memory for storing the image data read from the first memory, and reads rotated image data from the third memory and transfers the rotated image data to the second memory without transferring the rotated image data to the first memory. By virtue of the structure recited in Claim 16, after image data is read from the first memory, the first memory is available for use in generating further image data from print data.

Sato relates to an image forming apparatus including an image forming section, a page memory for storing image data to be transferred to the image forming section, and a DMA controller. The DMA controller continuously transfers a plurality of words of image data with the same row address from the page memory to the image forming section. Sato discusses the use of the DMA controller to transfer image data from the page memory to a vertical/horizontal

conversion, which outputs vertical/horizontal converted image data. The DMA controller returns the converted image data to the same addresses of the page memory by DMA transfer. Subsequently, the DMA controller transfers the converted image data from the page memory to a plotter in a rotated condition.

Since Sato discusses reading the image data from the page memory and, after rotation processing, sending the rotated image back to the page memory, the page memory of Sato cannot be re-used until the resulting image has been transferred from the page memory to the plotter. Nothing has been found in Sato that would teach or suggest a transfer unit that "includes a third memory for storing the image data read from the first memory, and reads rotated image data from the third memory and transfers the rotated image data to the second memory without transferring the rotated image data to the first memory," as recited in Claim 16.

The disclosure of Nakajima does not remedy the deficiencies of Sato.

Nakajima relates to an image forming apparatus that detects the size and direction of a document on a platen, and executes image processing depending on the detected direction. Nothing in Nakajima has been found to teach or suggest a transfer unit that "includes a third memory for storing the image data read from the first memory, and reads rotated image data from the third memory and transfers the rotated image data to the second memory without transferring the rotated image data to the first memory," as recited in Claim 16.

Therefore, even if Sato and Nakajima were combined in the manner suggested by the Examiner, assuming such a combination would even be permissible, the result would not meet the terms of Claim 16.

A review of the other art of record has failed to reveal anything which, in

Applicant's opinion, would remedy the deficiencies of the art discussed above, as a reference against Claim 16.

Independent Claim 22 recites features similar to those discussed above with respect to Claim 16 and, therefore, is believed to be patentable over the prior art of Sato and Nakajima for the reasons discussed above.

Independent Claims 19 and 26 are directed to methods in accordance with Claims 16 and 22, respectively. Applicant submits that the foregoing remarks in support of Claims 16 and 22 apply equally to Claims 19 and 26. Therefore, Applicant submits that independent Claims 19 and 26 are allowable and respectfully requests same.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

This Amendment After Final Action is believed clearly to place this application in condition for allowance and, therefore, its entry is believed proper under 37 C.F.R. § 1.116. Accordingly, entry of this Amendment After Final Action, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, it is respectfully requested that the Examiner contact Applicant's undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicant respectfully

request favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,
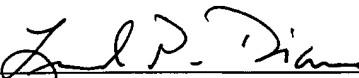
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